

EXHIBIT A

PARTIES' JOINT CLAIM CONSTRUCTION CHART

FOR FAMILY 8 PATENTS

Disputed Claim Term	Patent, Asserted Claims	Plaintiff's Proposed Construction	Defendants' Proposed Construction
“Impulse Noise Protection (INP) value / INP value”	Claims 13, 14, 19, 24	<p>The term is already defined in the claim.</p> <p>“specifies a number of consecutive DMT symbols that, when completely corrupted by impulse noise, can be corrected”</p> <p><u>Intrinsic Evidence:</u></p> <p><i>See, e.g.</i>, Exh. B (‘705 patent) at 1:36-48, 2:2-15, 2:16-36, 2:60-63, 4:39-50, 5:26-42, 5:43-54.</p>	<p>“a number of consecutive DMT symbols that, when completely corrupted by impulse noise, can be corrected using FEC and interleaving during Showtime”</p> <p><u>Intrinsic Evidence:</u></p> <p><i>See, e.g.</i>, Exh. B (‘705 patent), at 1:28-32; 1:40-42; 1:65-2:9; 5:55-67; FIGS. 1-4, 6.</p> <p><i>See, e.g.</i>, Exh. C (Prosecution History of ‘705 patent), Written Opinion of the International Searching Authority dated Feb. 8, 2006.</p> <p><i>See, e.g.</i>, Exh. D (U.S. Provisional Application No. 60,619,618), at 1-4.¹</p> <p><i>See, e.g.</i>, Exh. E (Prosecution History of Application No. 12/769,747), Notice of Allowance dated Aug. 18, 2014; Comments on Statement of Reasons for Allowance dated Nov. 3, 2014.</p>
“initialization message indicating an impulse Noise Protection (INP) value”	Claims 13, 14, 19, 24	<p>“a message sent during initialization that indicates an Impulse Noise Protection (INP) value” - - “Impulse Noise Protection (INP) value” is construed as described above.</p> <p><u>Intrinsic Evidence:</u></p> <p><i>See, e.g.</i>, Exh. B (‘705 patent) at Fig. 6,</p>	<p>“a message sent during initialization that provides the INP value”</p> <p><u>Intrinsic Evidence:</u></p> <p><i>See, e.g.</i>, Exh. B (‘705 patent), at 1:40-59; 2:39-41; 5:13-15; 5:61-6:11; 6:37-40; 8:55-59; FIGS. 2-4, 6.</p> <p><i>See, e.g.</i>, Exh. D (‘618 provisional), at 1-</p>

¹ The ‘618 provisional does not have paginations. Page 1 refers to the page of the ‘618 provisional that includes the section entitled “Background.”

		1:48-54, 2:20-36, 2:60-63, 4:39-50, 5:26-42, 5:43-54, 7:6-31	5.
<p>“a transmitter or a receiver module, capable of transmitting or receiving, respectively, . . .; and the transmitter module capable of transmitting, during the initialization procedure of the DMT transceiver” /</p> <p>“a transmitter or a receiver module, capable of transmitting or receiving, respectively, . . .; and the receiver module capable of receiving, during the initialization procedure of the DMT</p>	Claims 13, 14, 19, 24	Not indefinite	<p>Indefinite</p> <p><u>Intrinsic Evidence:</u></p> <p><i>See, e.g.</i>, Exh. B (’705 patent), at FIGS. 2-4, 6; 5:26-54; 8:52-9:8; 9:18-36; 9:46-10:5; 10:25-43.</p>

transceiver”			
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Claim Term	Patent, Claims	Agreed Construction
“transceiver”	Claims 13, 14, 19, 24	The Parties agree to be bound by the Court’s construction of “transceiver” in Family 1. ^{2, 3}
Preamble	Claims 13, 14, 19, 24	Limiting
“Showtime”	Claims 13, 14, 19, 24	“that state of the transceiver reached after all initialization and training is completed, in which user data is transmitted or received”

² Plaintiff has proposed that “transceiver” should be construed to mean “communications device capable of transmitting and receiving data wherein the transmitter portion and receiver portion share at least some common circuitry.” Plaintiff agrees that the Court’s construction of “transceiver” for the Family 1 Patents will also apply to the Family 8 Patents. TQ Delta reserves all rights to challenge construction of this term on appeal. Intrinsic Evidence: Exh. B (’705 patent) at Figs. 1-4, 4:21-33.

³ Defendants have proposed that “transceiver” should be construed as “communications device capable of transmitting and receiving data” based on at least the following intrinsic evidence: *see, e.g.*, Exh. B (’705 patent), at 2:9-15, 4:18-23, 4:30-33. Defendants agree to be bound by the Court’s construction of “transceiver” in Family 1 for purposes of streamlining the case. Defendants reserve the right to challenge the Court’s construction of “transceiver” on appeal as to all Families 1-10.